

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**JAMES D. JOHNSON, as next friend to
Olivia Y., et al.**

PLAINTIFFS

vs.

CIVIL ACTION NO.: 3:04-CV-251-TSL-FKB

**PHIL BRYANT, as Governor
of the State of Mississippi, et al.**

DEFENDANTS

**JOINT MOTION FOR CONTINUANCE OF EVIDENTIARY HEARING ON MOTION
FOR CONTEMPT**

The parties jointly file this motion for continuance of the evidentiary hearing scheduled for the Renewed Motion for Contempt and for Appointment of a Receiver (“Motion for Contempt”) [Dkt. 622] and in support of this Motion state as follows:

1. On March 9, 2015, Plaintiffs filed a Motion for Contempt requesting that this Court find Defendants in contempt and for the appointment of a general receiver with full authority to administer Mississippi’s child welfare system [Dkt. 622].
2. On May 22, 2015, this Court entered an Amended Scheduling Order for the Motion for Contempt [Dkt. 646] setting the evidentiary hearing for August 10, 2015.
3. The parties have reached an agreement to continue the evidentiary hearing scheduled for August 10, 2015, based upon the terms set forth in their Agreed Order submitted to the Court contemporaneously with the filing of this joint motion.
5. Due to the self-explanatory nature of this joint motion, the parties respectfully request that the Court waive any requirement that a supporting memorandum of law be filed.

WHEREFORE, PREMISES CONSIDERED, the parties jointly request that this Court enter the Agreed Order continuing the hearing on Plaintiffs Motion for Contempt and for such other and further relief, in law or in equity, to which they may be entitled.

Respectfully submitted, this the 21st day of July, 2015.

/s/ Dewitt L. (“Rusty”) Fortenberry, Jr.
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CERTIFICATE OF SERVICE

I, Dewitt L. Fortenberry, Jr., do hereby certify that I have on this day, electronically filed a true and correct copy of the forgoing document with the Clerk of Court using the ECF system which sent notifications of such to counsel as follows:

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SO CERTIFIED, this the 21st day of July, 2015.

/s/ Dewitt L. ("Rusty") Fortenberry, Jr.